

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	BANKRUPTCY NO. 13-10903TPA
	:	
WILLIAM JAMES SMATHERS, and CARRIE	:	
ELIZABETH SMATHERSM, his wife,	:	HON. THOMAS P. AGRESTI
Debtors	:	
	:	
PNC BANK, N.A.,	:	CHAPTER 13
Movant,	:	
	:	RELATED TO CLAIM NO.
v.	:	
	:	
WILLIAM JAMES SMATHERS, and CARRIE	:	
ELIZABETH SMATHERSM, his wife; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	
	:	

DECLARATION

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,
INC.

BY: /s/Michael S. JanJanin

Michael S. Jan Janin, Esquire
PA Id. No. 38880
2222 West Grandview Boulevard
Erie, Pennsylvania 16506-4508
Telephone: 814-833-2222, Extension 1045
Direct Dial: 814-314-1051
Facsimile: 814-833-6753
E-Mail: mjanjanin@quinnfirm.com
Counsel for Debtors, Williams James Smathers and
Carrie Elizabeth Smathers

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	BANKRUPTCY NO. 13-10903TPA
	:	
WILLIAM JAMES SMATHERS, and CARRIE	:	
ELIZABETH SMATHERSM, his wife,	:	HON. THOMAS P. AGRESTI
Debtors	:	
	:	
PNC BANK, N.A.,	:	CHAPTER 13
Movant,	:	
	:	RELATED TO CLAIM NO.
v.	:	
	:	
WILLIAM JAMES SMATHERS, and CARRIE	:	
ELIZABETH SMATHERSM, his wife; and	:	
RONDA J. WINNECOUR, ESQUIRE,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	
	:	

CERTIFICATE OF SERVICE OF DECLARATION

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on March 5, 2018.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was: Electronic Notification via the CM/ECF System.

Ronda J. Winnecour, Esquire, Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

If more than one method of service was employed, this certificate of service groups the parties by the type of service. For example, the names and addresses of parties served by electronic notice will be listed under the heading "Service by Electronic Notification," and those served by mail will be listed under the heading "Service by First-Class Mail."

EXECUTED ON: March 5, 2018

Respectfully submitted,

QUINN, BUSECK, LEEMHUIS, TOOHEY & KROTO,
INC.

BY: /s/Michael S. JanJanin
Michael S. Jan Janin, Esquire
PA Id. No. 38880
2222 West Grandview Boulevard
Erie, Pennsylvania 16506-4508
Telephone: 814-833-2222, Extension 1045
Direct Dial: 814-314-1051
Facsimile: 814-833-6753
E-Mail: mjanjanin@quinnfirm.com
Counsel for Debtors, William James Smathers and
Carrie Elizabeth Smathers